



भारत सरकार/Government of India  
खान मंत्रालय/Ministry of Mines  
भारतीय खान ब्यूरो/Indian Bureau of Mines  
हैदराबाद क्षेत्रीय कार्यालय/Hyderabad Regional Office



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Room No.603, 6<sup>th</sup> Floor,  
CGO Towers, Kavadiguda,  
Secunderabad – 500 080  
Date: 29.07.2022

To  
Dr..Anand Reddy,Nominated Owner,  
M/s BMM Cements Ltd,  
Road No.10,Plot No.111,  
Jubilee Hills,  
Hyderabad-500 033  
Telangana State.

Sub: Submission of Modified Mining Plan in respect of Gudipadu Limestone mine of M/s BMM Cements Ltd over an extent of 454.59Ha.. in Gudipadu village of Yadiki Mandal, Anantapur District of AP State submitted under Rule 17(3) of MCR, 2016.

Ref: 1.Your email dated 11.07.2022.

Sir,

With reference to your letter cited above on the subject, the draft Modified Mining plan is examined and the site inspection was carried out on 20.07.2022 by Shri Kalmata, RMG accompanied by Shri S.Suresh Reddy,Mines Manager and Shri C.Venkata Ramana, Geologist (Qualified Person) and found certain deficiencies as given in Annexure. The same has been forwarded to you and your Qualified Person on respective e.mail ids i.e.,... [info@sagarcements.in](mailto:info@sagarcements.in), [sureshreddys@sagarcements.in](mailto:sureshreddys@sagarcements.in), [siramsuresh321@gmail.com](mailto:siramsuresh321@gmail.com) and [ramanacv@sagarcements.in](mailto:ramanacv@sagarcements.in).

02. You are advised to attend the deficiencies as per the annexure and resubmit the document, complete in all respects, in three bound copies along with soft copy in the form of CD (4Nos.). In this regard, you are directed to submit the Financial Assurance in the form of Bank Guarantee for the area put on use for Mining and allied activities @ Rs.Five lakhs/hectare for category 'A' mines provided that the minimum amount shall be Rs.Ten lakhs as per the provision of Rule 27(1) of MCDR, 2017 at the time of submission of final copies of the document within 15 (fifteen) days from the date of issue of this letter, failing which the document will be disposed without giving any further opportunity.

03. The para-wise clarification & the manner in which the deficiencies are attended should be given while forwarding modified document.

Yours faithfully,

*Shumar*  
29/7/22

(Shailendra Kumar)

Regional Controller of Mines

Copy to Shri C.Venkata Ramana,Qualified Person for information & necessary action.

*Shumar*  
29/7/22

(Shailendra Kumar)

Regional Controller of Mines

मूल पति पर नही  
खान नियंत्रक (द), भारतीय खान ब्यूरो, बेंगलुरु।

*शैलेंद्र*  
29/7/22

(शैलेंद्र कुमार)

क्षेत्रीय खान नियंत्रक

Scrutiny comments on examination of draft Modification in approved mining plans submitted under rule 17(3) of MCR 2016 in respect of Gudipadu Limestone mine of M/s Sagar Cements(R) Ltd., over an extent of 454.59Ha, in Gudipadu village, Yadiki- Mandal, Anathapur-District of Andhra Pradesh.

- 1) **General:**
  - i) The lease was executed after the notification of MMDR Amendment Act 2015 and for the cases which are executed after notification of the said Act (10 A 2(c) case) , lessee has to sign the MDPA with the concerned authorities.
  - ii) At para 1.1, the five-year block should be mentioned as 2020-21 to 2024-25 (Proposed period for modification 2022-23 to 2024-25). And for name of the lessee, previous name of the company also needs to be mentioned in bracket.
  - iii) At para 1.1.2, Since the lease is already executed, the details of LOI issued may be mentioned as Not applicable. Further period for which modification is proposed should be corrected as discussed during the field visit.
  - iv) At para 1.2, under land ownership details, instead of land details, toposheet number is given, which is not correct. Under land ownership details, Type of the land, Survey number, villages, etc., falling within the lease area needs to be furnished.
  - v) At para 1.3.1, date of last approved document should be corrected as 12.10.2020.
  - vi) Address proof and Photo ID of the nominated owner is not enclosed as annexure. Further, the address given in the text and address mentioned in the List of Board of directors are different. Copy of PAN card of Nominated owner and QP is not enclosed as annexure.
  - vii) The document should be prepared as per the format of Mining plan.
  - viii) All the copies related to Change of Name of the company needs to be enclosed as annexure.
  - ix) Qualification and experience certificate of the QP is not enclosed as annexure.
  - x) Feasibility Report should be prepared as per the MEMC Rule 2015.
- 2) **Geology and exploration:**
  - i) At para 2.1.4, thickness of the each lithounit should be mentioned based on the exploration data.
  - ii) Any study carried out for the grain size of calcite and texture given at para 2.1.4.3 need to be mentioned and copy of the same to be enclosed as annexure.

iii) At para 2.1.4.7, under extent of mineralization, details of different ore bands existing within the lease area with dimension need to be discussed.

iv) At para 2.2 (2.2.1 to 2.2.1.14), only summary of exploration carried out during last plan period should be discussed as advised during filed visit. The exploration carried out in the past i.e., before last approved plan period should be given at para 2.2.2(2.2.2.1 to 2.2.2.14).

vi) Ore which is blocked in the safety barrier of nallah and roads should be estimated under remaining resources. In some of the sections it is observed that the same has been estimated under reserve.

vii)- The details of geometry of orebody given at para 2.2.3 is not matching with the total resources shown at para 2.2.4.13. This needs to be rechecked and corrected.

viii) At para 2.2.4.1, under methodology adopted for estimations, only method adopted for estimation of reserves/resources, including, exploration details, threshold value, cutoff, bulk density, recovery factor taken, etc. should be discussed and other unnecessary text should be removed.

ix) The detail calculation given for block cotton soil to be removed from the para 2.2.4.2(1).

x) The bulk density and recovery factors taken for estimation of reserves/resources should be based on the test conducted by NABL accredited laboratory.

xi) Sectional area taken for estimation of reserves/resources under different categories needs to be rechecked and corrected.

xii) At para 2.2.4.13(page no-58), Unit for estimation is mentioned as tonnes, but in the table, quantity is given in million tonnes.

**3) Mining: -i)** As per the drone survey data submitted to this office, the area covered under pit is around 26.00Ha, however, at para 4.2.1.1, area covered by pit is shown as 18.70Ha only, the details of pit dimension and area should be updated based on the latest survey.

ii) At para 4.2.2 (4.2.2.1 & 4.2.2.2) and other relevant paras the years which are already lapsed should be removed from proposals as discussed during the field visit. Further, instead of writing first year, second year, the financial years should be mentioned in the proposals. And for the year 2022-23, proposed year should be mentioned as 2022-23 and effective month should be mentioned in the bracket.

iii) During field visit it was observed that topsoil is removed completely by scraping without formation of any bench, but in the proposals one bench is proposed in topsoil. This need to be rechecked, further bench parameters given for topsoil is also incorrect. If bench formation is not required in topsoil, then only proposed quantity should be given in the table as per the discussion.

iv) At para 4.2.2.2, proposed Year wise ROM quantity given in the table is not matching with the volume and bulk density. This needs to be rechecked and corrected.

v) Recovery is shown 95%, but nothing is mentioned for remaining 5%, this need to be rechecked and corrected as discussed during the filed visit.

vi) For location of advancement, Northing and Easting should be mentioned along with co-ordinates and co-ordinates should be given for starting and ending points of the proposed area.

vii) ROM volume and quantity in tonnes, varies from page to page, the details of ROM given on page no 69 and 70 (Para4.2.2.2) are not matching. Further, it is not clear whether, subgrade generation given in the table at page number 70 is a part of ROM or not. Subgrade is a part of ROM and it should not show separately. The production and development tables should be given as per the format of Mining plan only.

viii) At para 4.3.2 and 4.3.4, Quantity of ROM should be corrected as per the scrutiny comments given on para 4.2.2.2 and proposed years should be mentioned as financial years. Further, ore to OB Ratio should be corrected as 1:0 or Nil.

ix) Machine calculations and requirement for drilling and blasting should be calculated by taking maximum handling proposed in the block period only.

**4) Sustainable Mining:** -i) In sustainable mining, proposed third year should be corrected as 2024-25.

ii) A brief note on proposed year wise CSR activities as discussed during field visit should be enclosed as annexure.

**5) Progressive Mine closure Plan:** - i) At para 6.1, status of land use should be given for the proposed five-year block period only. Further, the details of total area degraded and reclaimed area are incorrect. The details of land use patterns should be updated based on the latest survey, as discussed during field visit.

ii) Proposed area under water storage should be rechecked and corrected. The working pit cannot be shown as water Reservoir.

iii) The proposed years should be mentioned as financial years in all the paras and years which are already lapsed should be removed from the table.

iv) Entire area is shown as mineralized, but at the conceptual stage, area covered under mining is shown as 108.55Ha only. This needs to be rechecked. Further, at para 6.2.11, proposed area under mining and other activities should be calculated up to the conceptual period (End of life of the mine). For worked out pits, area utilized for allied activities, reclamation and rehabilitation are shown as Nil. This needs to be corrected as per the discussion during the field visit.

**6) Financial assurance/performance surety: -i)** The area put to use should be given year wise as per the format of mining plan. Further, the lease was executed after the notification of MMDR Amendment Act 2015 and for the cases which are executed after notification of the said Act, lessee has to sign the MDPA with the concerned authorities. Accordingly, MDPA should be signed before submission of final copies and copy of MDPA should be enclosed as annexure.

**7) Review of Previous proposals: -i)** The land use pattern given at para 8.1 should be corrected as discussed during the field visit. Further, the tables should be as per the format of mining plan.

ii) Proposals and actuals should be given for the financial years, and data furnished should be verified with the returns submitted to this office.

iii) financial years should be mentioned instead of first year, second year etc., and Review should be given for the last approved plan period only.

**Plans and sections: -**

**1) General: -i)** KML files of land use pattern, lease boundary, proposed working, dumping and other proposals should be given in polygon. **ii)** Previous name of the company should be mentioned in bracket.

**2) Geological plan and sections: - i)** All the drilled boreholes should be properly shown on Surface Geological plan and sections with Boreholes no, collar level and depth. Further, no boreholes are proposed in the proposed modification period, but on geological sections index is given for proposed boreholes. This needs to be

rechecked. The index which are not applicable should be removed. **ii)** Lithology shown on Geological plan and sections are not matching. This needs to be corrected.

**3) Production and development plan and sections:** -i) The year wise proposed benches shown on plan and section should be updated based on the scrutiny comments given in the mining chapter for mismatching of Proposed ROM quantity with respect to Volume and bulk density. **ii)** Instead of mentioning first bench, second bench, proposed benches with R.Ls should be mentioned as discussed during field visit.

**4) Financial assurance plan:** -i) Area considered for financial assurance under different heads should be properly shown with different color codes/ patterns for easy identification and same should be indexed.

**5) Conceptual plan&sections:** -i) Measures taken for reclamation and rehabilitation of worked out pits, dumps etc. are not shown on conceptual plan and sections. **ii)** Table showing land use pattern at present, at the end of five-year plan period and conceptual period should be shown on conceptual plan.

**6) Reclamation plan/ Progressive mine closure plan:** -i) On progressive mine closure plan only year wise proposals of plantation, retaining walls, garland drains and any other proposals related to PMCP should be discussed. The year wise proposals should be shown by different colors and same should be shown in the index. In present submission on PMCP plates conceptual proposals are shown. this need to corrected as discussed during field visit.

**7) Environment plan and key plan :** -i) Environmental plan and key plan should be prepared incorporating all the points, given in Rule 32(5)(b) of MCDR-2017. Further, existing plantation within the lease area within core and buffer zone should be shown on environment plan. **ii)** Other mining leases, agricultural lands and any other features existing within 500 mtrs should be shown as discussed during the field visit.



*[Faint, illegible text, possibly bleed-through from the reverse side of the page.]*